

Coronavirus Disease 2019 (COVID-19): Guidance for Tuberculin Skin Testing and COVID-19 Vaccinations

AUDIENCE:

Licensees subject to Chapters 2380 (Adult Training Facilities), 2800 (Assisted Living Residences), 3270 (Child Day Care Centers), 3280 (Group Child Day Care Homes), 3290 (Family Child Day Care Homes), 3680 (Administration and Operation of a Children and Youth Social Service Agency), 3700 (Foster Family Care Agency), 3800 (Child Residential and Day Treatment Facilities), 5310 (Community Residential Rehabilitation Services for the Mentally Ill), 5320 (Requirements for Long-Term Structured Residence Licensure), 6400 (Community Homes for Individuals with an Intellectual Disability or Autism), and 6500 (Life Sharing Homes) of Title 55 of the Pennsylvania Code under the purview of the Office of Child Development and Early Learning (OCDEL), the Office of Children, Youth and Families (OCYF), the Office of Developmental Programs (ODP), the Office of Long Term Living (OLTL), and the Office of Mental Health and Substance Abuse Services (OMHSAS).

PURPOSE:

To provide guidance related to regulatory compliance with Tuberculin Skin Testing (TST) requirements after receiving a COVID-19 vaccination.

DISCUSSION:

DHS licensed facilities are required to ensure individuals receiving services and/or staff members in their employ are free from communicable diseases and/or receive a negative TST upon admission/hire and every 2 years thereafter pursuant to:

- OCDEL regulations 55 Pa. Code §§ 3270.151(c)(2), 3280.151(c)(2), 3290.151(c)(2)
- OCYF regulations 55 Pa. Code §§ 3680.22(b)(5), 3700.62(b), 3800.151 and 3800.152
- OLTL regulations 55 Pa. Code § 2800.141(a)(11)
- OMHSAS regulations 55 Pa. Code §§ 5310.14(e)(1) and 5320.41(1)
- ODP regulations 55 Pa. Code §§ 2380.111(c)(5), 2380.113(c)(2), 6400.141(c)(6), 6400.151(c)(2), 6500.121(c)(6), and 6500.125(c)(2)

The implementation of guidance released by the CDC related to the postponement of TB testing after receiving the COVID-19 vaccinations may put a licensee out of compliance with TB testing requirements.

CDC Guidance

CDC guidance relating to vaccination indicates that the 2-step tuberculosis skin test should not be given within 4 weeks after the COVID-19 2-dose vaccination process. In the guidance:

[Interim Clinical Considerations for Use of mRNA COVID-19 Vaccines Currently Authorized in the United States](#), the CDC states:

“COVID-19 vaccines should not be delayed because of testing for TB infection. Testing for TB infection with one of the immune-based methods, either the [tuberculin skin test \(TST\)](#) or an [interferon release assay \(IGRA\)](#), can be done before or during the same encounter as COVID-19 vaccination. When testing with TST or IGRA cannot be done at the same time as COVID-19 vaccination, these tests should be delayed ≥ 4 weeks after the completion of COVID-19 vaccination but generally should not be cancelled.”

“When considering a tuberculin skin test or interferon-gamma release assay:

- The TST is not expected to have an effect on the safety or the effectiveness of COVID-19 vaccine. IGRAs are blood tests and, thus, do not affect vaccine safety or effectiveness.
- The reliability of a positive TST or IGRA result after COVID-19 vaccination is expected to be the same as without the vaccination. COVID-19 vaccination is not expected to cause false positive results from a TB test that is done at the same encounter as or after COVID-19 vaccination.
- The reliability of a negative TST or IGRA result after COVID-19 vaccination has not been [studied](#).
- The TST is not a vaccine. The guidance for separating other vaccines from COVID-19 vaccination by at least 2 weeks in time does not apply to the TST because the TST is not a vaccine.

When a tuberculin skin test or interferon gamma release assay is required by policy:

- A TST or IGRA to meet administrative requirements (for example, for [healthcare employment](#) or for admission to long-term care) can be done prior to COVID-19 vaccination or at the same encounter. COVID-19 vaccination should not be delayed because of testing for TB infection.
- A TST or IGRA should be deferred until ≥ 4 weeks after the completion of COVID-19 vaccination. If testing requirements or policies cannot be modified for the COVID-19 pandemic to accept this delay in TST or IGRA testing, it should be understood that a false negative TST or IGRA cannot be excluded, and consideration should be given to repeating negative TST or IGRA tests at least 4 weeks after the completion of COVID-19 vaccination. If TST was the initial test, [boosting](#) could be a factor if the result of the repeat test is positive.

When a tuberculin skin test or interferon gamma release assay is indicated for medical care:

- The decision whether a TST or IGRA that is being done for [medical diagnosis](#) of latent TB infection (for example, during a [contact investigation](#) after [exposure to contagious TB](#) disease) should be delayed for 4 weeks after completion of COVID-19 vaccination is at the discretion of the responsible medical provider and local [tuberculosis program](#) overseeing the contact investigation. Medical providers and local tuberculosis programs may not wish to delay testing for people at high risk for progression to TB disease. However, patients who have a negative result in this context should be considered for retesting ≥ 4 weeks after the completion of COVID-19 vaccination.

- Patients who have [symptoms](#) or diagnostic findings consistent with active TB disease should receive further medical evaluation—for example with chest radiography and sputum bacteriology for *Mycobacterium tuberculosis*—regardless of TST or IGRA results.”

Compliance with TST requirements

In following guidance from health care practitioners and the CDC, DHS recognizes licensees may be out of compliance with communicable disease and/or TST requirements if a staff member or individual has received a COVID-19 vaccination.

Due to the CDC guidance related to TST and COVID-19 Vaccinations impact on licensees’ ability to comply with regulatory requirements and with the Governor’s authorization as conferred in the Disaster Proclamation, the Department has temporarily issued a limited suspension of the timing of the TST provisions in the following sections of 55 Pa. Code:

- OCDEL regulations 55 Pa. Code:
 - §3270.151(c)(2)
 - §3280.151(c)(2)
 - §3290.151(c)(2)
- OCYF regulations 55 Pa. Code:
 - §3680.22(b)(5)
 - §3700.62(b)
 - §3800.151
 - §3800.152
- OLTL regulations 55 Pa. Code § 2800.141(a)(11)
- OMHSAS regulations 55 Pa. Code:
 - § 5310.14(e)(1)
 - § 5320.41(1)
- ODP regulations 55 Pa. Code:
 - § 2380.111(c)(5)
 - § 2380.113(c)(2)
 - § 6400.141(c)(6)
 - § 6400.151(c)(2)
 - § 6500.121(c)(6)
 - § 6500.125(c)(2)

Compliance with the TST requirements for the above regulations will be achieved provided that the licensee, individual, or staff person meets the following:

- Consults with their physician regarding the recent administration of the COVID-19 vaccination and upcoming TST;
- Obtains documentation of the COVID-19 vaccine administration, including the date of administration or written documentation from the individual’s or staff person’s physician of the necessity to defer TST; and
- Follows physician recommendations as it relates to TST as soon as possible after completing a COVID-19 vaccine schedule.

This suspension will last until the end of the Governor's Disaster Declaration.

CONTACT:

Please contact your respective regional office with any questions about this announcement. Licenses under ODP should submit questions to the Regulatory Administration Unit at RA-PW6100REGADMIN@pa.gov.